

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TERRY CARTER, JENNIFER KRUEGER  
AND LISBETT RODRIGUEZ,

Plaintiffs,

v.

TRANSIT TELEVISION NETWORK LLC,  
Defendant.

Case No. 07 C 6608

Judge Leinenweber  
Magistrate Judge Nolan

**JURY TRIAL DEMANDED**

**MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

Defendant Transit Television Network LLC (hereafter "Defendant" or "TTN") respectfully requests this Court to grant this Motion for Entry of Agreed Protective Order governing the disclosure of confidential information in this action. In support of this Motion, TTN states as follows:

1. Plaintiffs Terry Carter, Jennifer Krueger and Lisbett Rodriquez (collectively "Plaintiffs") filed their amended complaint alleging violations of Title VII of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000e *et seq.*), Section 1977 of the Revised Statutes, 42 U.S.C. Section 1981, as amended ("Section 1981"), and the Equal Pay Act provisions of the Fair Labor Standard Act ("Equal Pay Act"), arising from their employment with Defendant Transit Television Network LLC:

2. The parties are engaging in discovery. Plaintiffs have propounded certain discovery to TTN requesting it produce certain documents, including without limitation, confidential personnel files, performance reviews, non-compete agreements, severance pay and general release agreements, disciplinary records, financial and banking information, confidential sales reports and account

information. These documents contain social security numbers and other personal identifying information relating to current and former TTN employees not party to the instant litigation as well as non-public business and financial documents from TTN.

3. Whereas, TTN treats this information and these documents as highly confidential and strictly limits access to this information or these documents to third persons, TTN brings this Motion to protect and maintain the sensitive nature of the confidential information to be produced to Plaintiffs.

4. Counsel for each party has reviewed the attached Agreed Protective Order and agrees to the entry of said Agreed Protective Order by this Court as evidenced by counsels' signatures.

5. Good cause exists for the issuance of an Order granting the entry of the attached Agreed Protective Order for the reasons stated above.

6. As per Judge Harry D. Leinenweber's Standing Order, attorneys for TTN emailed a proposed Order granting the entry of the attached Agreed Protective Order to Proposed\_Order\_Leinenweber@ilnd.uscourts.gov.

7. WHEREFORE, Defendant Transit Television Network LLC respectfully requests that this Court grant its Motion for Entry of Agreed Protective Order.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that the foregoing MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER was filed electronically with the Northern District of Illinois on May 2, 2008, and is available for viewing and downloading from the Electronic Case Filing (ECF) System.

Service of this MOTION was accomplished electronically through the ECF System on the following ECF registered filing users:

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